REMARKS

Claims 1-16 were pending at the time of examination. Claim 1 has been amended. No new matter has been added. The Applicants respectfully request reconsideration based on the foregoing amendments and these remarks.

Claim Rejections – 35 U.S.C. § 102

Claims 1-14 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,704,768 to Zombek et al. (hereinafter Zombek). The Applicants respectfully traverse the rejection for the following reasons.

As was mentioned in the previous response, the Applicants' invention relates to a system and method for enabling the interchange of enterprise data through an open platform. The open platform can be based on a standardized interface that enables parties to easily connect to and use the network. Services operating as senders, recipients and in-transit parties can leverage a framework that overlays a public network (Abstract). Zombek, on the other hand, is directed to a system, method and computer program product for providing server discovery services during a startup sequence. More specifically, Zombek discloses a system for communicating messages in a client-server environment over one or more wireless networks that can support different network protocols.

The preamble of claim 1 has been amended to recite that the message is an application level message that has a header and a body and/or an attachment, in order to further clarify the invention and distinguish from the "couple messages" and "reply messages" of Zombek. Furthermore, steps (b) and (c) have been amended to recite:

> (b) receiving, from a second service, a message including said identifier, said message being directed to a mapped service, wherein said mapped service is an entity account-specific representation of said first service and acts as a proxy for said first service, and wherein said mapped service is operable to determine whether a route for said message needs to be modified prior to delivering said message to said first service; and
>
> (c) when said mapped service determines that said route for said message does not need to be modified, translating, by said message routing network, said message for delivery to said first service, wherein said translated message includes said identifier and is directed from said mapped service to said first service.

That is, the mapped service is able to determine whether the message route needs to be modified before the message is delivered from the mapped service to the first service. This

allows various modifications to be made on the message by other services before the message is delivered to the first service. Such modifications may, for example, include a credit check or other look-up or addition of data to the message that is required by the first service before the message is actually delivered to the first service. As is recited in step (c), in the event that the route does not need to be modified, the message is translated and directed from the mapped service to the first service. Support for this amendment can be found throughout the detailed description, and in particular in paragraph [1074]. It is respectfully submitted that Zombek does not disclose or render obvious any mapped services that has this capability, and that for at least this reason, the rejection of claim 1 be withdrawn.

Claim 9 is a *Beauregard* claim corresponding to claim 1, and is therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 1, and the rejection of claim 9 under 35 U.S.C. § 102(e) should be withdrawn.

Claim 10 is directed to a message routing system including a message routing network that enables routing of a message between a first service and a second service. The message is associated with an account that is supported by the second service. The message routing network effects a virtual service through which the first service and the second service communicate. The implementation of the virtual service is supported by a mapping that associates the virtual service with the account. As described in paragraph [1023] of the Applicants' specification, the virtual service can act as a proxy to other services. This can be useful, for example, when a business X has a relationship with a business Y, and would like that messages sent to business X's service are redirected to business Y's service. Services can implement redirection through routing scripts that map invocations of the service to invocations of another service, including redirection of replies.

The Examiner alleges that this is shown in col. 22, lines 50-61 of Zombek. The Applicants respectfully disagree. The cited section of Zombek discloses the operations of the MR when it receives an incoming message from a client application. Depending on the type of message that is received, a number of different actions may be taken by the MR. The message router of Zombek does not function as a proxy through which two services communicate, as required by claim 10. Rather, the message router (124) of Zombek merely does a one-time determination (through a number of alternative mechanisms) of where to send a message (i.e., to which BES) when the message does not contain any explicit BES ID. For at least this reason, it should be clear that the Applicants' invention, as defined in claim 10, is neither anticipated nor rendered obvious in view of Zombek, and the rejection of claim 10 under 35 U.S.C. § 102(e) should be withdrawn.

Claims 2-8 all depend from claim 1, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 1, and the rejections of claims 2-8 under 35 U.S.C. § 102(e) should be withdrawn.

Claims 11-14 all depend from claim 10, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 10, and the rejections of claims 11-14 under 35 U.S.C. § 102(e) should be withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claim 15 was rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication 2004/0243574 to Giroux et al (hereinafter Giroux) in view of U.S. Patent No. 6,925,488 to Bantz et al (hereinafter Bantz). The Applicants respectfully traverse the rejection for the following reasons. Claim 16 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Giroux and Bantz in view of Zombek.

Claim 15 is directed to a message routing method. A proxy service is provided by the message routing network for messages transferred between a first application service provider and a second application service provider in the message routing network. The first application service provider and the second application service provider provide application services for an enterprise. The proxy service enables the first application service provider to send information on behalf of the enterprise to the second application service provider without the first application service provider and the second application service provider having knowledge of each other at any point in time.

The Examiner alleges that the ASP server 160 of Giroux can be considered to be equivalent to the claimed "proxy service." The Applicants respectfully disagree. Generally, a proxy service or proxy server is defined as a service that allows clients to make indirect network connections to other network services. A client connects to the proxy service, then requests a connection, file or other resource available on a different server. The proxy service provides the resource either by connecting to the specified server, or by serving the resource from a cache. This is not the role of ASP server 160 in Giroux. In contrast, the ASP server 160 in Giroux "supports the ASP of the invention" (paragraph [0050]) and stores the software necessary for transferring data from a first ASP to a second ASP (paragraph [0058]). Nothing in Giroux states that all user requests are required to go through ASP server 160. In fact, paragraph [0080] of Giroux states that ASP server 160 "...is the actual ASP web-site of the invention. This site is not normally accessed directly by the client, but rather is referred by a partner website. The ASP

server 160 web-site of the invention will then portray the look and feel of the referring website." This is obviously contrary to the role of a proxy service.

The Examiner acknowledges that Giroux does not teach sending information "without said first application provider and said second application service provider having knowledge of each other at any point in time." Instead, the Examiner relies on Bantz as teaching this limitation. Whereas this may be true, it makes little sense to combine Giroux and Bantz, since the whole point of Giroux is to transfer data from one ASP to another, at the request of a user. Such a transfer would be difficult to accomplish without the user having knowledge of the destination of the data transfer. For at least these reasons, the rejection of claim 15 under 35 U.S.C. § 103(a) is unsupported by the cited art and should be withdrawn.

Claim 16 depends from claim 15, and is therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 15. Zombek does not cure the deficiencies of the Giroux/Bantz combination discussed above. Thus it is respectfully submitted that the rejection of claim 16 under 35 U.S.C. § 103(a) be withdrawn.

Conclusion

The Applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
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